

**FairPoint Communications, Inc.**  
**State of New Hampshire**  
**Docket No. DT 07-011**

**Respondent:** Peter G. Nixon  
**Title:** President

**REQUEST:** Office of Consumer Advocate - Rebuttal

**DATED:** September 19, 2007

**ITEM:** OCA R-135 Re page 27, lines 9 through 17, of the Rebuttal Testimony of Peter G. Nixon.

- a. When are the anticipated goals and objectives expected to be defined?
- b. Please provide the referenced goals and objectives that FairPoint establishes.
- c. Does FairPoint have similar goals and objectives for its operations in any of its existing territories? If so, please provide an example of such goals and objectives that FairPoint has established elsewhere.

**REPLY:**

**OBJECTION:** FairPoint objects to Data Request R-135 on the grounds that it seeks highly confidential and proprietary commercial and strategic information that would provide competitors a business advantage if disclosed. The information sought pertains to the provision of competitive services and includes trade secret information that required significant effort and cost to produce and/or confidential, research or commercial information, including customer, geographic, market and product-specific data. Subject to and without waiving this objection, FairPoint will provide information responsive to Data Request R-135. [Objection served September 25, 2007.]

- a. FairPoint plans to have the KPIs finalized by December 3, 2007.
- b. Comprehensive listing is estimated to be available on December 3rd, 2007.
- c. Yes. Please refer to FPNH 1301 (example of the FairPoint Call Center Report).